

EXHIBIT B

(Plaintiff's transmittal letter
dated 4/25/23)

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VIA SECURE FILE TRANSFER

April 25, 2023

John E. Branch III
Nelson Mullins Riley & Scarborough LLP
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603

Re: *Azima v. Del Rosso*, Case No. 1:20-cv-00954-WO-JLW
(M.D.N.C.) - Production of Documents by Plaintiff Farhad
Azima

Dear Mr. Branch:

On behalf of Plaintiff Farhad Azima, enclosed is the first response (second production overall) to Defendants Nicholas Del Rosso and Vital Management Services, Inc.'s First Set of Requests for Production served on March 31, 2023. The Bates range of this production is FA_MDNC_00000580 through FA_MDNC_01007804. The password to the production will be sent via email.

The documents can be downloaded from <https://milchev.sharefile.com>. You were provided an activation email on Friday, April 21, 2023 to set up your account to login to retrieve the materials.

This production contains documents published on WeTransfer, including Plaintiff's trade secrets. This production of the trade secrets contained therein does not waive any argument that the trade secrets were still trade secrets before they were misappropriated and published onto the public domain destroying their secrecy. The documents published on WeTransfer also include privileged documents that were placed in the public domain without our client's consent. Accordingly, those documents remain privileged, and this production does not waive any privilege protections that apply. All documents are produced subject to forthcoming written objections. We reserve all rights.

Future productions will be made on a rolling basis, notwithstanding any discovery disagreements.

Sincerely,



Calvin Lee